<u>REMARKS</u>

Claims 1-22, all the claims pending in the application, stand rejected on prior art grounds. Applicants respectfully traverse these rejections based on the following discussion.

I.   The Prior Art Rejections

Claims 1-22 stand rejected under 35 U.S.C. §102(e) as being anticipated by Kushler, et al. (U.S. Publication No. 2004/0140956), hereinafter referred to as Kushler. Applicants respectfully traverse these rejections based on the following discussion.

The claimed invention provides a system and method for relaxing typing accuracy on a computer keyboard. More specifically, the number of keys tapped on the keyboard (keystroke landing points) is counted and a set of words are created from a lexicon having the same amount of keystroke landing points. For each letter in each word in the set, the method computes the distance from the pattern formed by the landing coordinate to the pattern formed by the letters in words in a database. Subsequently, a word is selected from the set having the shortest total distance.

In the rejection, the Office Action argues that Kushler discloses many features of the claimed invention. However, Applicants submit that the number of "points of contact" of Kushler (which the Office Action asserts teaches the "keystroke landing points" of the claimed invention) does not equal the number of letters in the word determined. Instead, the number of letters in the word determined by the system of Kushler can be greater than or less than the number of "points of contact". Therefore, as

explained in greater detail below, Applicants respectfully submit that the prior art of record does not teach or suggest the claimed invention.

Applicants traverse the rejections because Kushler fails to disclose the claimed features of "determining a word … wherein said total number of keystroke landing points tapped equals a total number of letters in said word". Such features are defined in independent claims 1, 8, 15, and 22 using similar language.

The Office Action argues that the "points of contact" of Kushler teach the "keystroke landing points" of the claimed invention (Office Action, p. 3, item 3b). However, the number of "points of contact" of Kushler does not equal the number of letters in the word determined by the system of Kushler. Instead, the number of letters in the word determined by the system of Kushler can be greater than or less than the number of "points of contact".

As described in the Abstract of Kushler, the Continuous Stroke Word-Based Text Input System allows someone to use a small on-screen keyboard to quickly enter words by drawing a continuous line that passes through or near the keys of each letter in a word in sequence without lifting the stylus (similar to a children's connect-the-dots drawing). The user traces an input pattern for a word by contacting the keyboard on or near the key of the first letter of the word, then tracing through each letter in sequence, lifting the stylus from the screen upon reaching the last letter.

As further described in paragraph 0042 and 0044 of Kushler, the length of the input path cannot be reliably associated with the length of a word in terms of the number of letters in the word, since a word could have a small number of widely separated letters

(e.g. "ape") or a larger number of closely spaced letters (e.g. "deceased"). Words with the same expected input pattern path length may differ greatly in the number of letters in the words.

For example, as illustrated in FIG. 2B of Kushler, input pattern 2200 has <u>four</u> "points of contact", i.e., points 2212, 2214, 2216, and 2218. However, the word determined can include <u>five</u> letters, i.e., the word "G-R-E-A-T" (item 2208).

Accordingly, Applicants submit that the number of "points of contact" of Kushler (which the Office Action asserts teaches the "keystroke landing points" of the claimed invention) does not equal the number of letters in the word determined. Instead, the number of letters in the word determined by the system of Kushler can be greater than or less than the number of "points of contact". Therefore, it is Applicants position that Kushler fails to disclose the claimed features of "determining a word … wherein said total number of keystroke landing points tapped equals a total number of letters in said word" as defined in independent claims 1, 8, 15, and 22.

Therefore, it is Applicants' position that the prior art of record does not teach or suggest many features defined by independent claims 1, 8, 15, and 22 and that such claims are patentable over the prior art of record. Further, it is Applicants' position that dependent claims 2-7, 9-14, and 16-21 are similarly patentable, not only because of their dependency from a patentable independent claims, but also because of the additional features of the invention they defined. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the rejections.

II.   Formal Matters and Conclusion

In view of the foregoing, Applicants submit that claims 1-22, all the claims presently pending in the application, are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary. Please charge any deficiencies and credit any overpayments to Attorney's Deposit Account Number 09-0441.

Respectfully submitted,

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